

TO THE HONORABLE CHIEF BANKRUPTCY JUDGE RONALD B. KING:

Come Now Debtors, Plaintiffs, and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row, as successors-in-interest to Black Duck Properties, LLC (collectively the “Debtors”), and file this Agreed Motion to Continue Deadlines Related to DMA Properties, INC. (“DMA”) and Longbranch Energy, LP’S (“Longbranch Energy”) Motion for Preliminary Injunction to Preserve Assets Pending Mediation on Agreeable Terms and in support would respectfully show as follows:

1. Beginning on January 11, 2021, the Court held a bench trial on this matter.
2. On April 9, 2021, Defendants filed their Notice of Appeal.
3. On March 15, 2023, United States District Judge Jason Pulliam entered a Final Judgment affirming in part, reversing in part, and remanding this matter to the Bankruptcy Court.
4. On May 23, 2023, Debtors filed a Motion for Status hearing.
5. On May 31, 2023, Third Party Plaintiff DMA and Defendant Longbranch Energy, LP filed a Motion for Preliminary Injunction to Preserve Assets (the “Motion”).
6. On May 31, 2023, the Court held a status hearing. Debtor’s response to the Motion is due on June 12, 2023, and the Court set the Motion to be heard on June 28, 2023.
7. The Parties have now conferred and agreed to continue all deadlines related to the Motion. If mediation fails, the parties will return to the Court and provide proposed agreed available dates to proceed with the Motion and related discovery matters.

WHEREFORE, PREMISES CONSIDERED, Debtors request that this Court enter an Agreed Order to Continue Deadlines Related to DMA Properties, INC. and Longbranch Energy, LP’S Motion for Preliminary Injunction to Preserve Assets Pending Mediation on Agreeable Terms

Dated: June 9, 2023.

Respectfully submitted,

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By: /s/ John Muller

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 9th day of June 2023:

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